Remarks

Claims 16-38 are at issue. Claims 16-38 stand rejected under 35 USC 103(a) as being unpatentable over www.heise.de/ix/artikel/E/1991/06/106 (Herein after "Marcherius") and hyper.sunjapan.com/cn/~hz/win32/styles3 (herein after "Windows").

Marcherius is not Prior Art under 35 USC 102

The date of the filing for the present application is November 13, 2001 and its priority date is March 9, 1998. The Marcherius article has a date of March 21, 2004. Marcherius does state in his article that in November 1996 a working committee presented XML, but the present application is not claiming XML but the use of XML in a data format conversion system. The fact that the author states this date does not tell us when the article was written. 35 USC 102 requires that the printed publication be before the date of filing of the application. The Examiner has made no attempt to even determine or state when this article was published. All the rejections based on Marcherius must be withdrawn and the final revoked, unless the Examiner can give a plausible explanation as to why this article was ever considered prior art.

Invention

The Examiner does not seem to understand even the basic elements of the invention. The present application is directed to the problem that enterprise systems, such as, billing, payroll, accounting systems uses different formats to store their data. For example, one system may store data in a relational database, while another system may store data in an object oriented database. A client system needing information from each of these different systems has to use the communication format understood by the server (enterprise system). (See Page 1 of the specification) This requires a different set of code for each source of information. Commonly the code is developed for a specific application, so the portion of the code accessing these sources of data is not reusable. (See Page 2 of the specification) Industry spends millions of dollars every year attempting to solve these sort of enterprise problems.

The present invention solves many of these problems by a system that has an easy to use authoring tool that, in one embodiment, converts all these legacy formats into XML and vice versa. Thus the heart of the invention is a system that makes it easy

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to convert data from a legacy format to XML and back. (See page 10 of the specification).

The references the Examiner points to are not even related to the same problem as the present application.

Questions

The applicants ask that the Examiner answer the following questions, so that they may better understand how to explain the differences between the prior art and the present application. In order to avoid ambiguity most of the questions are yes/no questions, but any elaboration related to the questions is appreciated.

1) Does the Examiner understand that the invention requires converting from data in one data format into data in another format?

2) Does the Examiner understand that the prior art reference, Marcherius, does not show conversion of data from one type of format into another type of format?

3) Does the Examiner understand that the DDF (Document Definition File) is not a DTD (Document Type Definition)?

4) Does the Examiner understand that a DDF specifies the sources for different types of data that are requested by a client system? (See Page 9 of the specification)

5) Does the Examiner understand that the Macherius system is just an explanation of XML?

6) Does the Examiner understand that the Windows reference is directed to the hierarchical relationship between the windows on a screen of a computer?

7) Can the Examiner explain how a reference to the hierarchical relationship of windows on a computer screen is relevant to XML? Or how it is relevant to a system that converts data from one format to a second format?

Claim 16 requires a "user-defined document definition file. None of the prior art references show a user-defined document definition file. According the specification, a document definition file must specify the content, source and method of generation of the data. In addition, claim 16 requires replacing a reference with an actual value. The Examiner has not even attempted to show either of these features. Claim 16 is clearly allowable over the prior art.

Claim 29 requires a hierarchical data server, a server and a client. The article by Marcherius does not show a client, server and hierarchical data server. In fact Marcherius is merely explaining the structure of XML and does not discuss servers and clients. Note that a DTD (Document Type Definition) is not a document definition file (as required by the claim). A document definition file is a template for extracting information from a server or group of servers (See discussion starting on Page 9 of specification entitled "Document Definition File). A DTD is a formal set of grammar which defines the XML (See Marcherius, page 3, "DTD:Layout Language). A document definition file is not shown in either of the references cited by the Examiner.

Windows merely teaches the relationship between the windows on a computer screen. How this could be combined with XML is never revealed by the article or the Examiner. There is no discussion of servers in Windows and certainly not a hierarchical data server. Windows does discuss the hierarchy of windows on a computer screen, but this is not claimed in claim 29. Claim 29 is allowable over the prior art.

Claim 34 requires receiving a request from a client and executing a document definition file. Note that a DTD (Document Type Definition) is not a document definition file. A document definition file is a template for extracting information from a server or group of servers (See discussion starting on Page 9 of specification entitled "Document Definition File). A DTD is a formal set of grammar which defines the XML (See Marcherius, page 3, "DTD:Layout Language). A document definition file is not shown in either of the references cited by the Examiner. In addition, Marcherius never discuss an enterprise system. Enterprises systems are existing corporate systems that do not

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use XML, such as relational databases. Windows merely teaches the relationship between the windows on a computer screen. How this could be combined with XML is never revealed by the article or the Examiner. There is no discussion of servers in Windows and certainly not a hierarchical data server. Windows does discuss the hierarchy of windows on a computer screen, but this is not claimed in claim 34. Claim 34 is allowable over the prior art.

Claim 17 requires a document definition file. Note that DTD (Document Type Definition) is not a document definition file. A document definition file is a template for extracting information from a server or group of servers (See discussion starting on Page 9 of specification entitled "Document Definition File). A DTD is a formal set of grammar which defines the XML (See Marcherius, page 3, "DTD:Layout Language). Claim 17 is allowable over the prior art.

The rejections of claims 18-28, 30-33 & 35-38 amount to Official Notice. The applicants traverses these rejections and demand that the Examiner find a reference that shows these elements.

The application has been placed in condition for allowance, prompt reconsideration and allowance are respectfully requested
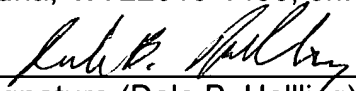
Respectfully submitted,

By   _____

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I hereby certify that a ____Response_____ is being deposited with the United States Postal Service as first class mail in an envelope addressed to: Commissioner of Patents and Trademarks, P.O. Box 1450, Alexandria, VA 22313-1450, on:

_____
Date

_____
Signature (Dale B. Halling)

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